

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES))
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

THE DEPOSITION OF JOEL REED,
produced as a witness on behalf of the Plaintiff in
the above styled and numbered cause, taken on the
11th day of June, 2007, in the City of West Siloam
Springs, County of Delaware, State of Oklahoma,
before me, Lisa A. Steinmeyer, a Certified Shorthand
Reporter, duly certified under and by virtue of the
laws of the State of Oklahoma.

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EXHIBIT

36

1 Q I'm sorry. What integrator did you first work
2 with?

3 A George's.

4 Q And the time frame you worked with George's is
5 what?

09:08AM

6 A '87 to '90.

7 Q Were you growing broilers?

8 A Yes.

9 Q And were you growing those at the same
10 location where you are today?

09:08AM

11 A Yes.

12 Q Have you worked for any other integrators
13 besides George's and your current integrator?

14 A Than my current integrator?

15 Q Yes, other than the one you are working for
16 now?

09:09AM

17 A No.

18 Q And the one you are working for now is who?

19 A Simmons.

20 Q And you've worked continuously for Simmons
21 since 1990 or sometime after?

09:09AM

22 A Yes, yes.

23 Q I sometimes talk a little fast and when we do
24 the deposition, I need to -- you need to wait until

25 I finish my answer and I'll try -- or finish my

09:09AM

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1 A No.

2 Q So when they're delivered to you, you've not
3 had any choice in the kind of bird that comes to
4 you; is that correct?

5 A That's correct. 10:02AM

6 Q Who supplies all the feed to your farm for the
7 birds?

8 A The integrator does.

9 Q Both of them?

10 A Yes. 10:02AM

11 Q Who delivers the feed to your farm?

12 A Simmons and George's.

13 Q Who supplies medication for the birds when in
14 your care?

15 A The integrators. 10:02AM

16 Q Who supplies any vaccinations required for the
17 birds?

18 A The integrators.

19 Q Do you pay for any of the medication or
20 vaccinations that are administered to the birds? 10:03AM

21 A No.

22 Q Who supplies any veterinary services that you
23 may require for the birds?

24 A The integrators do.

25 Q Do each of the integrators supply you with a 10:03AM

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1 field service rep or a service tech person?

2 A Yes.

3 Q And have they always done that?

4 A Yes.

5 Q How often do you see that service tech? Let 10:03AM

6 me ask you this: How do you refer to that person

7 that comes to see your farm?

8 A Field man.

9 Q Field man?

10 A Yeah. 10:03AM

11 Q How often would a field man come to see you

12 when you were with George's?

13 A Usually once a week.

14 Q And is that the same with Simmons?

15 A Yes. 10:03AM

16 Q Do they come more often if needed?

17 A Yes.

18 Q When they do come more often, it's because you

19 requested it or they just came or both?

20 A Usually because I requested it. 10:03AM

21 Q Do you receive advice and recommendations from

22 the field man with regard to your operations?

23 A Yes.

24 Q Do you generally try and follow that advice?

25 A Sometimes. 10:04AM

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1 Q Do the field men make a physical inspection of
2 your operation when they come?

3 MR. WISLEY: Object to form.

4 Q Do the field men make a physical inspection of
5 your growing operation when they come to see you? 10:04AM

6 MR. WISLEY: Same objection.

7 A Yes.

8 Q Tell me what it is they look at.

9 A Usually just the performance of the birds, how
10 they look, the air quality, anything that might need 10:04AM
11 attention as far as feeders, waterers, temperature.

12 Q All right. Do they take a physical
13 temperature reading when they are there?

14 A No.

15 Q Do you have a thermometer inside that would 10:05AM
16 indicate the temperature inside the barn?

17 A Yes.

18 Q Do they make notes of that when they're there?

19 A Yes.

20 Q Do they prepare a written report for you on 10:05AM
21 their visits?

22 A Yes.

23 Q What happens to that report?

24 A I usually throw it away.

25 Q What's that report called? 10:05AM

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